

TOGUT, SEGAL & SEGAL LLP
Bankruptcy Conflicts Counsel for Delphi Corporation, et al.,
Debtors and Debtors in Possession
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(212) 594-5000
Neil Berger (NB-3599)
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HEARING DATE: 12/6/2007
AT: 10:00 a.m.

RESPONSE DEADLINE: 11/16/2007

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<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
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DELPHI CORPORATION, et al., : Chapter 11
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Debtors. : Case No. 05-44481 [RDD]
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Jointly Administered
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**NOTICE OF DEBTORS' MOTION FOR A SUMMARY JUDGMENT EXPUNGING
CLAIM NUMBER 2247 ASSERTED BY SIEMENS VDO AUTOMOTIVE S.A.S.**

PLEASE TAKE NOTICE that, upon the accompanying (i) Statement of Undisputed Material Facts Pursuant to Local Bankruptcy Rule 7056-1 in Support of Debtors' Motion for a Summary Judgment Expunging Claim Number 2247 Asserted By Siemens VDO Automotive S.A.S., (ii) Debtors' Memorandum and (iii) the Declaration of Jane S. Thompson dated October 30, 2007, Delphi Corporation and certain of its subsidiaries and affiliates (the "Debtors"), by their attorneys, Togut, Segal & Segal LLP, will move before the Honorable Robert D. Drain, United States Bankruptcy Judge, in Room 610 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408 on December 6, 2007, at 10:00 a.m. or as soon thereafter as counsel may be heard, for a summary judgment pursuant to Rule 56 of the Federal Rules of Civil

Procedure and Rule 7056 of the Federal Rules of Bankruptcy Procedure expunging claim number 2247 asserted against the Debtors' estates by Siemens VDO Automotive S.A.S. ("VDO").

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the relief sought by this Motion (a) must be in writing, (b) must conform to the Federal Rules of Bankruptcy Procedure, the Local Rules of the United States Bankruptcy Court for the Southern District of New York, the Order under 11 U.S.C. §§ 102 (1) and 105 and Fed. R. Bankr. P. 2002(m), 9006, 9007, and 9014 Establishing (i) Omnibus Hearing Dates, (ii) Certain Notice, Case Management, and Administrative Procedures, and (iii) Scheduling Initial Case Conference in Accordance with Local Bankr. R. 1007-2(e) (the "Case Management Order") (Docket No. 245), (c) must be filed pursuant to General Order M-242¹ (as amended) – registered users of the Bankruptcy Court's case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in portable document format ("PDF"), WordPerfect, or any other Windows-based word processing format), (d) must be submitted in hard copy directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) must be served upon: (i) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: General Counsel); (ii) conflicts counsel for the Debtors, Togut, Segal & Segal LLP, One Penn Plaza, New York, New York 10119 (Attn: Neil Berger, Esq.); and (iii) counsel for the Official committee of Unsecured Creditors, Latham Watkins, LLP, 885 Third Avenue, Suite 1000, New York, New York 10022 (Attn: Robert J. Rosenberg, Esq.) in each case so as to be filed and received no later than November 16, 2007.

¹ Copies of General Order M-242 and the User's Manual for the Bankruptcy Court's Electronic Case Filing System are available at the official web site of the United States Bankruptcy Court for the Southern District of New York at www.nysb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that only those timely written objections made in accordance herewith, and in accordance with the Joint Stipulation and Agreed Order Establishing Schedule for Briefing Concerning Objection to Proof of Claim Number 2247, will be considered by the Bankruptcy Court, and that if no objections to the Motion are timely filed, the Bankruptcy Court may enter an Order granting the Motion.

Dated: New York, New York
October 31, 2007

DELPHI CORPORATION, *et al.*,
By their Bankruptcy Conflicts Counsel,
TOGUT, SEGAL & SEGAL LLP
By:

/s/ Neil Berger
NEIL BERGER (NB-3599)
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